

Robert A. Sacks (SBN 150146) (sacksr@sullcrom.com)
 SULLIVAN & CROMWELL LLP
 1888 Century Park East
 Los Angeles, CA 90067
 Telephone: (310) 712-6600
 Facsimile: (310) 712-8800

Jason de Bretteville (SBN 195069) (debrettevillej@sullcrom.com)
 R. Jeremy Adamson (SBN 251380) (adamsonrj@sullcrom.com)
 SULLIVAN & CROMWELL LLP
 1870 Embarcadero Road
 Palo Alto, California 94303
 Telephone: (650) 461-5600
 Facsimile: (650) 461-5700

Attorneys for Defendants SOFTBANK HOLDINGS, INC.
 SOFTBANK AMERICA, INC. and SOFTBANK
 CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE UTSTARCOM, INC. SECURITIES
 LITIGATION

Master File No. C-04-4908-JW (PVT)

STIPULATION AND [PROPOSED]
ORDER EXTENDING CLASS
CERTIFICATION BRIEFING

This Document relates to:
 ALL ACTIONS

WHEREAS, on February 26, 2010, pursuant to the Court's Scheduling Order issued on
 February 17, 2010 ("Scheduling Order"), Plaintiffs re-filed their Motion for Class Certification;

WHEREAS, pursuant to the Scheduling Order, the SoftBank Defendants are required to
 file their Opposition to Plaintiffs' Motion for Class Certification on or before March 26, 2010;

WHEREAS, pursuant to the Scheduling Order, the Plaintiffs are required to file any
 Reply in support of their Motion for Class Certification on or before April 16, 2010;

1 WHEREAS, on March 4, 2010, the SoftBank Defendants issued a subpoena to Plaintiffs'
 2 expert, Jane D. Nettesheim, to appear for a deposition on March 17, 2010 at 9:00 a.m. in connection
 3 with her declaration in support of Plaintiffs' Motion for Class Certification;

4 WHEREAS, the parties have continued to conduct settlement negotiations in good faith
 5 to resolve this action and have scheduled a mediation before the Honorable Edward A. Infante, on
 6 March 23, 2010;

7 WHEREAS, the parties have met and conferred and agreed, subject to the Court's
 8 approval of this stipulation, that it would be in the best interests of the parties to postpone the deposition
 9 of Ms. Nettesheim until March 26, 2010, after the March 23, 2010 mediation, and to extend the
 10 remaining class certification briefing by one week so as to enable the SoftBank Defendants to consider
 11 Ms. Nettesheim's deposition testimony in connection with their Opposition and to allow the parties to
 12 focus their resources on the mediation;

13 WHEREAS, the extension of the briefing schedule by one week would not affect the
 14 hearing date on the Motion for Class Certification previously set forth by the Court.

15 NOW THEREFORE, pursuant to the parties' stipulation and subject to the Court's
 16 approval, the remaining briefing schedule for Plaintiffs' Motion for Class Certification shall be as
 17 follows:

18 The SoftBank Defendants shall file their Opposition to Plaintiffs Motion for Class
 19 Certification on or before April 2, 2010, Plaintiffs shall file their Reply on or before April 23, 2010. The
 20 Court will conduct a hearing on Plaintiffs' Motion for Class Certification as previously ordered on May
 21 10, 2010 at 9:00 a.m.

22 Dated: March 10, 2010

23 /s/ Robert A. Sacks
 24 Robert A. Sacks (SBN 150146)
 25 SULLIVAN & CROMWELL LLP
 26 1888 Century Park East
 27 Los Angeles, CA 90067
 28 Telephone: (310) 712-6600
 Facsimile: (310) 712-8800

Jason de Bretteville (SBN 195069)
 R. Jeremy Adamson (SBN 251380)
 SULLIVAN & CROMWELL LLP

1870 Embarcadero Road
Palo Alto, California 94303
Telephone: (650) 461-5600
Facsimile: (650) 461-5700

*Attorneys for Softbank Holdings, Inc.
Softbank America, Inc. and Softbank
Corporation*

Dated: March 10, 2010

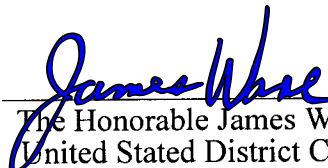
/s/ Shirley H. Huang
Shirley H. Huang
COUGHLIN STOIA GELLER RUDMAN
& ROBBINS LLP
Shawn Williams
Shirley H. Huang
COUGHLIN STOIA GELLER RUDMAN
& ROBBINS LLP
100 Pine Street, Suite 2600
San Francisco, CA 94111
Telephone: (415) 288-4545
Facsimile: (415) 288-4534

Lead Counsel for Plaintiffs

ORDER

PURSUANT TO THIS STIPULATION AND GOOD CAUSE APPEARING, IT IS SO
ORDERED that the SoftBank Defendants' shall file their Opposition to plaintiffs Motion for Class
Certification on or before April 2, 2010, Plaintiffs shall file their Reply on or before April 23, 2010. The
Court will conduct a hearing on Plaintiffs' Motion for Class Certification as previously ordered on May
10, 2010 at 9:00 a.m.

Dated: March 12 2010


The Honorable James Ware
United States District Court Judge

1 I, R. Jeremy Adamson, am the ECF User whose identification and password are being
2 used to file the Stipulation and [Proposed] Order Extending Class Certification Briefing. I hereby attest
3 that Shirley H. Huang has concurred in this filing.

4 Dated: March 10, 2010

/s/ R. Jeremy Adamson
R. Jeremy Adamson (SBN 251380)
SULLIVAN & CROMWELL LLP
1870 Embarcadero Road
Palo Alto, California 94303
Telephone: (650) 461-5600
Facsimile: (650) 461-5700

*Attorneys for Softbank Holdings, Inc.
Softbank America, Inc. and Softbank
Corporation*

PROOF OF SERVICE

I, Jennifer A. Thorn, declare:

I am employed in the City of Palo Alto, State of California. I am over the age of eighteen years and am not a party to this action. My business address is Sullivan & Cromwell LLP, 1870 Embarcadero Road, Palo Alto, California 94303. On March 10, 2010, I served the following documents:

STIPULATION AND [PROPOSED] ORDER EXTENDING CLASS CERTIFICATION BRIEFING

- ☒ by uploading the document(s) listed above to the United States District Court, Northern District of California's electronic filing system
- ☐ by transmitting via electronic mail the document(s) listed above to the electronic address(es) set forth below on this date.
- ☐ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Palo Alto, California addressed as set forth below. For all envelopes sent by First Class Mail, I placed each such envelope with postage thereon fully prepaid for the deposit in the United States. I am familiar with the firm's practice that is when correspondence is deposited with the personnel responsible for delivering correspondence to the United States Postal Service, such correspondence is delivered to the United States Postal Service that same day in the ordinary course of business:

Darren J. Robbins

Coughlin Stoia Geller Rudman & Robbins LLP
655 West Broadway
Suite 1900
San Diego, CA 92101
darrenr@csgrr.com

Patrick J. Coughlin

Coughlin Stoia Geller Rudman & Robbins LLP
655 West Broadway
Suite 1900
San Diego, CA 92101
PatC@csgrr.com

Sylvia Sum

Coughlin Stoia Geller Rudman & Robbins LLP
100 Pine Street, Suite 2600
San Francisco, CA 94111
Email: SSum@csgrr.com

Shirley H. Huang

Coughlin Stoia Geller Rudman & Robbins LLP
100 Pine Street, Suite 2600
San Francisco, CA 94111
Email: shirleyh@csgrr.com

Louis David Nefouse

Wilson Sonsini Goodrich & Rosati
650 Page Mill Road
Palo Alto, CA 94304
Email: dnefouse@wsgr.com

Cheryl Weisbard Foug

Wilson Sonsini Goodrich & Rosati
650 Page Mill Road
Palo Alto, CA 94304
Email: cfoug@wsgr.com

Terry T. Johnson

Wilson Sonsini Goodrich & Rosati
Professional Corporation
650 Page Mill Road
Palo Alto, CA 94304-1050
Email: tjohnson@wsgr.com

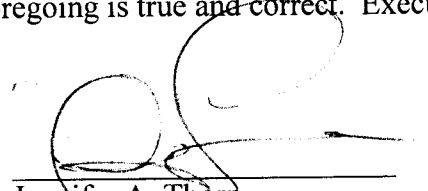
Bahram Seyedin-Noor

Wilson Sonsini Goodrich & Rosati
650 Page Mill Road
Palo Alto, CA 94304-1050
Email: bnoor@wsgr.com

Bryan Jacob Ketrosier

Wilson Sonsini Goodrich & Rosati
One Market Street, Spear Tower, Suite 3300
San Francisco, CA 94105
Email: bketrosier@wsgr.com

I declare under penalty of perjury that the foregoing is true and correct. Executed on
March 10, 2010, at Palo Alto, California.


Jennifer A. Thorn